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RECEIVED

OCT 23 2019

Enforcement and Compliance  
Assurance Division

October 21, 2019

United States Environmental Protection Agency, Region 8, Air Program  
Office of Enforcement, Compliance and Environmental Justice  
Air Toxics and Technical Enforcement Program, 8ENF-AT  
1595 Wynkoop Street  
Denver, Colorado 80202

Re: NSPS OOOOa Annual Report – 8/3/2018 – 8/2/2019  
Bear Den Gas Plant – Phase 1  
Arrow Midstream Holdings, LLC

ND

Dear Sir or Madam,

Arrow Midstream Holdings, LLC a subsidiary of Crestwood Midstream Partners LP, is submitting the New Source Performance Standard (NSPS) Subpart OOOOa Annual Report for the period of 8/3/2018 to 8/2/2019. This report includes information on six (6) reciprocating compressors in order to comply with 40 CFR §60.5420a (b). Crestwood does not operate any gas wells, storage vessels, centrifugal compressors or pneumatic controllers that would be considered affected facilities. Condensate tanks have potential emissions above six tons of volatile organic compounds (VOC) per year and are an affected facility for NSPS OOOOa. All other storage vessels operated by the Bear Den Gas Plant have enforceable permit limits of less than six tons of volatile organic compounds (VOC) per year and are therefore not NSPS OOOOa affected sources.

As of today's date, the OOOOa Annual Report template for upload into CEDRI is still in draft form. When this template has been finalized, Arrow will complete and upload future reports utilizing this system. Please see the attached PDF format of this completed template which contains applicable reciprocating compressor reportable information.

If you have any questions or require additional information, please contact me at (713) 380-3243.

Regards,

(b) (6)

Mitch Lagerstrom  
Senior Director Air & Environmental Compliance

Cc: North Dakota Department of Environmental Quality  
Mitch Lagerstrom, Arrow  
Curt Van Hoorn, Arrow  
Dean Volesky, Arrow

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for America's  
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Attachments

**40 CFR Part 60, Subpart OOOOa Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - §60.5420a Annual Report Spreadsheet Template**

**Instructions for Spreadsheet Template**

**Purpose:**

This spreadsheet template was designed by the U.S. EPA to facilitate annual reporting for Oil and Gas Facilities under 40 CFR part 60, subpart OOOOa. CEDRI is accessed through the EPA's Central Data Exchange (<https://cdx.epa.gov>)

**Electronic reporting:**

Electronic submission of annual reports through the EPA's Compliance and Emissions Data Reporting (CEDRI) is required under §60.5420a(b).

The CEDRI spreadsheet template upload feature allows you to submit data in a single report for a single facility or multiple facilities, as well as multiple sites, using this EPA provided Excel workbook. Data for the site(s) must be entered into the worksheet labeled "Site Information" in this Excel workbook. Each row in the "Site Information" worksheet includes the data for a single site. The Site Record No. will be used to match the information on each tab to the appropriate site.

**IMPORTANT:** For each site/facility record found in the "Site Information" worksheet, you may reference a single file attachment that includes all information for each citation found in the workbook or provide individual file names for each individual citation record. In the examples provided in the workbook, we provide both as an example.

The spreadsheet must be uploaded into CEDRI as a single ZIP file, which must include this Excel workbook and any related attachments that were referenced in any of the worksheets found in the workbook (e.g., the Certification file found in the "Site Information" worksheet).

Note: If you are uploading file attachments for your report, the uploaded files may be in any format (e.g., zip, docx, PDF). If you would like to include an Excel file(s) as an attachment, you must first zip the excel file(s) into a separate ZIP file to the master ZIP file that will be uploaded into CEDRI.

Once all data have been entered in the worksheet, combine this Excel workbook and all attachment files (including any ZIP file containing separate excel file(s), if applicable) into a single ZIP file for upload to CEDRI.

Please ensure your report includes all of the required data elements found in the listed citations below for this spreadsheet upload submission.

You must submit annual reports containing the information specified in paragraphs (b)(1) through (8) and (12) of this section. You must submit annual reports following the procedure specified in paragraph (b)(11) of this section.

## **§60.5420a What are my notification, reporting, and recordkeeping requirements?**

...

(b) *Reporting requirements*. You must submit annual reports containing the information specified in paragraphs (b)(1) through (8) and (12) of this section and performance test reports as specified in paragraph (b)(9) or (10) of this section, if applicable, except as provided in paragraph (b)(13) of this section. You must submit annual reports following the procedure specified in paragraph (b)(11) of this section. The initial annual report is due no later than 90 days after the end of the initial compliance period as determined according to §60.5410a. Subsequent annual reports are due no later than same date each year as the initial annual report. If you own or operate more than one affected facility, you may submit one report for multiple affected facilities provided the report contains all of the information required as specified in paragraphs (b)(1) through (8) of this section, except as provided in paragraph (b)(13) of this section. Annual reports may coincide with title V reports as long as all the required elements of the annual report are included. You may arrange with the Administrator a common schedule on which reports required by this part may be submitted as long as the schedule does not extend the reporting period.

(1) The general information specified in paragraphs (b)(1)(i) through (iv) of this section for all reports.

(i) The company name, facility site name associated with the affected facility, US Well ID or US Well ID associated with the affected facility, if applicable, and address of the affected facility. If an address is not available for the site, include a description of the site location and provide the latitude and longitude coordinates of the site in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.

(ii) An identification of each affected facility being included in the annual report.

(iii) Beginning and ending dates of the reporting period.

(iv) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(2) For each well affected facility, the information in paragraphs (b)(2)(i) through (iii) of this section.

(i) Records of each well completion operation as specified in paragraphs (c)(1)(i) through (iv) and (vi) of this section, if applicable, for each well affected facility conducted during the reporting period. In lieu of submitting the records specified in paragraph (c)(1)(i) through (iv) of this section, the owner or operator may submit a list of the well completions with hydraulic fracturing completed during the reporting period and the records required by paragraph (c)(1)(v) of this section for each well completion.

(ii) Records of deviations specified in paragraph (c)(1)(ii) of this section that occurred during the reporting period.

(iii) Records specified in paragraph (c)(1)(vii) of this section, if applicable, that support a determination under 60.5432a that the well affected facility is a low pressure well as defined in 60.5430a.

(3) For each centrifugal compressor affected facility, the information specified in paragraphs (b)(3)(i) through (iv) of this section.

(i) An identification of each centrifugal compressor using a wet seal system constructed, modified or reconstructed during the reporting period.

(ii) Records of deviations specified in paragraph (c)(2) of this section that occurred during the reporting period.

(iii) If required to comply with §60.5380a(a)(2), the records specified in paragraphs (c)(6) through (11) of this section.

(iv) If complying with §60.5380a(a)(1) with a control device tested under §60.5413a(d) which meets the criteria in §60.5413a(d)(11) and §60.5413a(e), records specified in paragraph (c)(2)(i) through (c)(2)(vii) of this section for each centrifugal compressor using a wet seal system constructed, modified or reconstructed during the reporting period.

(4) For each reciprocating compressor affected facility, the information specified in paragraphs (b)(4)(i) and (ii) of this section.

(i) The cumulative number of hours of operation or the number of months since initial startup or since the previous reciprocating compressor rod packing replacement, whichever is later. Alternatively, a statement that emissions from the rod packing are being routed to a process through a closed vent system under negative pressure.

(ii) Records of deviations specified in paragraph (c)(3)(iii) of this section that occurred during the reporting period.

(5) For each pneumatic controller affected facility, the information specified in paragraphs (b)(5)(i) through (iii) of this section.

(i) An identification of each pneumatic controller constructed, modified or reconstructed during the reporting period, including the identification information specified in §60.5390a(b)(2) or (c)(2).

(ii) If applicable, documentation that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than 6 standard cubic feet per hour are required and the reasons why.

(iii) Records of deviations specified in paragraph (c)(4)(v) of this section that occurred during the reporting period.

(6) For each storage vessel affected facility, the information in paragraphs (b)(6)(i) through (vii) of this section.

(i) An identification, including the location, of each storage vessel affected facility for which construction, modification or reconstruction commenced during the reporting period. The location of the storage vessel shall be in latitude and longitude coordinates in decimal degrees to an accuracy and precision of five (5) decimals of a degree using the North American Datum of 1983.

(ii) Documentation of the VOC emission rate determination according to §60.5365a(e) for each storage vessel that became an affected facility during the reporting period or is returned to service during the reporting period.

(iii) Records of deviations specified in paragraph (c)(5)(iii) of this section that occurred during the reporting period.

(iv) A statement that you have met the requirements specified in §60.5410a(h)(2) and (3).

(v) You must identify each storage vessel affected facility that is removed from service during the reporting period as specified in §60.5395a(c)(1)(ii), including the date the storage vessel affected facility was removed from service.

(vi) You must identify each storage vessel affected facility returned to service during the reporting period as specified in §60.5395a(c)(3), including the date the storage vessel affected facility was returned to service.

(vii) If complying with §60.5395a(a)(2) with a control device tested under §60.5413a(d) which meets the criteria in §60.5413a(d)(11) and §60.5413a(e), records specified in paragraphs (c)(5)(vi)(A) through (F) of this section for each storage vessel constructed, modified, reconstructed or returned to service during the reporting period.

(7) For the collection of fugitive emissions components at each well site and the collection of fugitive emissions components at each compressor station within the company-defined area, the records of each monitoring survey including the information specified in paragraphs (b)(7)(i) through (xii) of this section. For the collection of fugitive emissions components at a compressor station, if a monitoring survey is waived under §60.5397a(g)(5), you must include in your annual report the fact that a monitoring survey was waived and the calendar months that make up the quarterly monitoring period for which the monitoring survey was waived.

(i) Date of the survey.

(ii) Beginning and end time of the survey.

(iii) Name of operator(s) performing survey. If the survey is performed by optical gas imaging, you must note the training and experience of the operator.

(iv) Ambient temperature, sky conditions, and maximum wind speed at the time of the survey.

(v) Monitoring instrument used.

(vi) Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.

(vii) Number and type of components for which fugitive emissions were detected.

(viii) Number and type of fugitive emissions components that were not repaired as required in §60.5397a(h).

(ix) Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored.

(x) The date of successful repair of the fugitive emissions component.

(xi) Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair.

(xii) Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.

(8) For each pneumatic pump affected facility, the information specified in paragraphs (b)(8)(i) through (iii) of this section.

(i) For each pneumatic pump that is constructed, modified or reconstructed during the reporting period, you must provide certification that the pneumatic pump meets one of the conditions described in paragraphs (b)(8)(i)(A), (B) or (C) of this section.

(A) No control device or process is available on site.

(B) A control device or process is available on site and the owner or operator has determined in accordance with §60.5393a(b)(5) that it is technically infeasible to capture and route the emissions to the control device or process.

(C) Emissions from the pneumatic pump are routed to a control device or process. If the control device is designed to achieve less than 95 percent emissions reduction, specify the percent emissions reductions the control device is designed to achieve.

(ii) For any pneumatic pump affected facility which has been previously reported as required under paragraph (b)(8)(i) of this section and for which a change in the reported condition has occurred during the reporting period, provide the identification of the pneumatic pump affected facility and the date it was previously reported and a certification that the pneumatic pump meets one of the conditions described in paragraphs (b)(8)(i)(A), (B) or (C) or (D) of this section.

(A) A control device has been added to the location and the pneumatic pump now reports according to paragraph (b)(8)(i)(C) of this section.

(B) A control device has been added to the location and the pneumatic pump affected facility now reports according to paragraph (b)(8)(i)(B) of this section.

(C) A control device or process has been removed from the location or otherwise is no longer available and the pneumatic pump affected facility now report according to paragraph (b)(8)(i)(A) of this section.

(D) A control device or process has been removed from the location or is otherwise no longer available and the owner or operator has determined in accordance with §60.5393a(b)(5) through an engineering evaluation that it is technically infeasible to capture and route the emissions to another control device or process.

(iii) Records of deviations specified in paragraph (c)(16)(ii) of this section that occurred during the reporting period.

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(12) You must submit the certification signed by the qualified professional engineer according to §60.5411a(d) for each closed vent system routing to a control device or process.

(11) You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>).) You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted.

40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report  
For each reciprocating compressor affected facility, an owner or operator must include the information specified in paragraphs (b)(4)(i) and (ii) of this section in all annual reports:

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up )	Compressor ID * (\$60.5420a(b)(1)(ii))	Are emissions from the rod packing unit being routed to a process through a closed vent system under negative pressure? * (\$60.5420a(b)(4)(i))	If emissions are not routed to a process through a closed vent system under negative pressure, what are the cumulative number of hours or months of operation since initial startup or the previous rod packing replacement (whichever is later)? * (\$60.5420a(b)(4)(ii))	Units of Time Measurement * (\$60.5420a(b)(4)(i))	Deviations where the reciprocating compressor was not operated in compliance with requirements* (\$60.5420(b)(4)(ii) and \$60.5420a(c)(3)(iii))
	e.g.: Comp-12b	e.g.: no	e.g.: 2	e.g.: months	e.g.: Rod packing replacement exceeded 36 months. Replacement occurred after 37 months.
	1 C-101	No		8952 hours	None
	1 C-102	No		8919 hours	None
	1 C-103	No		8789 hours	None
	1 C-201	No		8919 hours	None
	1 C-202	No		8969 hours	None
	1 C-301	No		9001 hours	None



40 CFR Part 60 - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 - 60.5420a(b) Annual Report  
For each storage vessel affected facility, an owner or operator must include the information specified in paragraphs (b)(6)(i) through (vii) of this section in all annual reports:

The asterisk (\*) next to each field indicates that the corresponding field is required.

Facility Record No. * (Select from dropdown list - may need to scroll up )	Storage Vessel ID * (§60.5420a(b)(1)(ii) and §60.5420a(b)(6)(i))	Was the storage vessel constructed, modified or reconstructed during the reporting period? * (§60.5420a(b)(6)(i))	Latitude of Storage Vessel (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(i))	Longitude of Storage Vessel (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(i))	If new affected facility or if returned to service during the reporting period, provide documentation of the VOC emission rate determination according to §60.5365a(e). * (§60.5420a(b)(6)(ii))	Records of deviations where the storage vessel was not operated in compliance with requirements * (§60.5420a(b)(6)(iii) and §60.5420a(c)(5)(iii))
e.g.: Tank 125	e.g.: modified	e.g.: 34.12345	e.g.: -101.12345	e.g.: VOC emission rate is 6.5 tpy. See file rate_determination.pdf for more information.	e.g.: On October 12, 2016, the pilot flame was not functioning on the combustion unit controlling the storage vessel.	
1 TK-CO1	No	(b) (9)		N/A	N/A	
1 TK-CO2	No			N/A	N/A	
1 TK-CO3	No			N/A	N/A	

					Storage Vessels Constructed, Modified				
Have you met the requirements specified in §60.5410a(h)(2) and (3)?* (§60.5420a(b)(6)(iv))	Removed from service during the reporting period? * (§60.5420a(b)(6)(v))	If removed from service, the date removed from service. * (§60.5420a(b)(6)(v))	Returned to service during the reporting period? * (§60.5420a(b)(6)(vi))	If returned to service, the date returned to service. * (§60.5420a(b)(6)(vi))	Make of Purchased Device * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(A))	Model of Purchased Device * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(A))	Serial Number of Purchased Device * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(A))	Date of Purchase * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(B))	Copy of Purchase Order * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(C))
e.g.: Yes	e.g.: Yes	e.g.: 11/15/16	e.g.: Yes	e.g.: 11/15/16	e.g.: Incinerator Guy	e.g.: 400 Combustor	e.g.: 12383D392	e.g.: 12/10/16	e.g.: purchase_order.pdf or XYZCompressorStation.pdf
Yes	No				Tru North Steel	Flat, 500 BBL	19293F	7/1/2017	
Yes	No				Tru North Steel	Flat, 500 BBL	19292F	7/1/2017	
Yes	No				Tru North Steel	Flat, 500 BBL	19294F	7/1/2017	



ied, Reconstructed or Returned to Service During Reporting Period that Comply with §60.5395a(a)(2) with a Control Device Tested Under § 60.5413a(d)

Latitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(D))	Longitude of Control Device (Decimal Degrees to 5 Decimals Using the North American Datum of 1983) * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(D))	Inlet Gas Flow Rate * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(E))	Please provide the file name that contains the Records of Pilot Flame Present at All Times of Operation * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(F)(1 )) Please provide only one file per record.	Please provide the file name that contains the Records of No Visible Emissions Periods Greater Than 1 Minute During Any 15-Minute Period * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(F)(2 )) Please provide only one file per record.	Please provide the file name that contains the Records of Maintenance and Repair Log * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(F)(3 )) Please provide only one file per record.	Please provide the file name that contains the Records of Visible Emissions Test Following Return to Operation From Maintenance/Repair Activity * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(F)(4 )) Please provide only one file per record.	Please provide the file name that contains the Records of Manufacturer's Written Operating Instructions, Procedures and Maintenance Schedule * (§60.5420a(b)(6)(vii) and §60.5420a(c)(5)(vi)(F)(5 )) Please provide only one file per record.
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e.g.: 34.12340

e.g.: -101.12340

e.g.: 3000 scfh

e.g.: pilotflame.pdf or  
XYZCompressorStation.pdf

e.g.: noemissions.pdf or  
XYZCompressorStation.pdf

e.g.: maintainlog.pdf or  
XYZCompressorStation.pdf

e.g.: emistest.pdf or  
XYZCompressorStation.pdf

e.g.: manufinsruct.pdf or  
XYZCompressorStation.pdf

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